

## Message Text

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21

ACTION TRSE-00

INFO OCT-01 ARA-06 ISO-00 L-02 JUSE-00 CIAE-00 INR-05

NSAE-00 RSC-01 /015 W

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P R 151125Z NOV 74

FM AMEMBASSY BRASILIA

TO SECSTATE WASHDC PRIORITY 6454

INFO AMCONSUL RIO DE JANEIRO

AMCONSUL SAO PAULO

LIMITED OFFICIAL USE BRASILIA 8645

PASS TREASURY FOR NATHAN N. GORDON (INTERNATIONAL TAX POLICY)

E.O. 11652: N/A

TAGS: EFIN, BR

SUBJECT: US-BRAZIL BILATERAL TAX TREATY

1. FINANCIAL ATTACHE DISCUSSED SUBJECT OF BILATERAL TAX TREATY THIS WEEK WITH FRANCISCO DORNELLES OF THE MINISTRY OF FINANCE AND ALVARO DA COSTA FRANCO, CHIEF OF THE OFFICE OF FINANCIAL POLICY, MINISTRY OF FOREIGN RELATIONS AND MEMBER OF THE INTERNATIONAL TAX COMMISSION RESPONSIBLE FOR TAX TREATIES. THE OBJECTIVE OF MEETINGS WAS TO EXPLORE POSSIBILITIES OF STARTING EXPLORATORY TECHNICAL TALKS SOON. BOTH OFFICIALS REACTED FAVORABLY TO IDEA OF EARLY TALKS. DORNELLES CLAIMED THAT HE HAD ALREADY RECEIVED THE GREEN LIGHT FROM FINANCE MINISTER SIMONSEN. COSTA FRANCO SAID HE WOULD HAVE TO CHECK MATTER OUT WITH HIGHER OFFICIALS BUT WAS BASICALLY OPTIMISTIC. HE PROMISED TO GIVE A MORE DEFINITIVE REPLY AFTER HE HAS CLEARED SUBJECT THROUGH APPROPRIATE CHANNELS.

2. DORNELLES IS SCHEDULED TO BE IN WASHINGTON NEXT WEEK (NOV. 18-22) FOR A MEETING OF WORKING GROUP ON MULTINATIONALS. HE EXPRESSED STRONG INTEREST IN MEETING WITH NATHAN GORDON OF TREASURY (INTERNATIONAL TAX POLICY)

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DURING HIS STAY. HE HAS ASKED THAT WE INFORM GORDON

TO PLEASE CALL THOMPSON FLORES OF THE BRAZILIAN EMBASSY  
AND LEAVE WORD ON A CONVENIENT TIME FOR A MEETING  
BETWEEN NOVEMBER 18 AND 22.  
CRIMMINS

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NNN

## Message Attributes

**Automatic Decaptioning:** X  
**Capture Date:** 01 JAN 1994  
**Channel Indicators:** n/a  
**Current Classification:** UNCLASSIFIED  
**Concepts:** TAX AGREEMENTS, DIPLOMATIC DISCUSSIONS  
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**Draft Date:** 15 NOV 1974  
**Decaption Date:** 01 JAN 1960  
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**Disposition Approved on Date:**  
**Disposition Authority:** cunninfx  
**Disposition Case Number:** n/a  
**Disposition Comment:** 25 YEAR REVIEW  
**Disposition Date:** 28 MAY 2004  
**Disposition Event:**  
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**Review Authority:** cunninfx  
**Review Comment:** n/a  
**Review Content Flags:**  
**Review Date:** 10 SEP 2002  
**Review Event:**  
**Review Exemptions:** n/a  
**Review History:** RELEASED <10 SEP 2002 by boyleja>; APPROVED <13 MAR 2003 by cunninfx>  
**Review Markings:**

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30 JUN 2005

**Review Media Identifier:**  
**Review Referrals:** n/a  
**Review Release Date:** n/a  
**Review Release Event:** n/a  
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**Subject:** US-BRAZIL BILATERAL TAX TREATY  
**TAGS:** EFIN, BR, US  
**To:** STATE  
**Type:** TE  
**Markings:** Declassified/Released US Department of State EO Systematic Review 30 JUN 2005